

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

ANGELA STEWART,)	Case No. 3:20-cv-00679
)	
Plaintiff,)	Judge: Hon. Aleta A. Trauger
)	
v.)	JURY TRIAL DEMAND
)	
HEALTHCARE REVENUE RECOVERY)	
GROUP, LLC,)	
)	
Defendant.)	
_____)	

UNOPPOSED MOTION TO RESET JULY 18, 2022 PRETRIAL CONFERENCE

COMES NOW, Defendant Healthcare Revenue Recovery Group (“Defendant”), pursuant to Local Rule 6.01 and having conferred with Plaintiff Angela Stewart (“Plaintiff”), and respectfully submits this unopposed motion to reset the pretrial conference in the above-styled civil action. In support, Defendant respectfully states as follows:

1. On June 1, 2022, the Court entered its *Order Resetting Pretrial Conference* resetting the pretrial conference in this action from July 22, 2022 at 1:30 p.m. to July 18, 2022 at 1:30 p.m. and resetting forth the following pretrial deadlines:

July 1, 2022: Parties must exchange copies of exhibits, designations of portions of depositions to be read into evidence;

July 6, 2022: Filing deadline for motions in limine;

July 12, 2022: Filing deadline for responses to motions in limine;

July 12, 2022: Filing deadline for witness lists, exhibit lists, stipulations, and expert witness statements;

July 12, 2022: Filing deadline for Joint Pre-Trial Order;

July 22, 2022: Deadline for settlement notice to Court for parties' avoidance of possible assessment of cost of summoning jury;

Doc. 96.

2. On Wednesday, June 1, 2022, counsel for Defendant tested positive for the COVID-19 virus, despite being fully vaccinated and was ill and quarantined at her home when the Court issued the *Order Resetting Pretrial Conference*, and continued to recover from the virus through and including Sunday, June 5, 2022.

3. Upon counsel for Defendant's return to work, it was determined that the reset pre-trial conference posed a conflict with a trial that is set to begin on Monday, July 18, 2022 in the State Court of Athens-Clarke County, Georgia.

4. Counsel for Defendant communicated the above conflict to Plaintiff's counsel, who responded that he would not oppose a motion to reset the pretrial conference to an alternative date should one be available that is mutually convenient for the Court and counsel for both parties.

5. It appearing that counsel for both parties are available between Tuesday, July 12, 2022 and Friday, July 15, 2022, Defendant respectfully requests that the pretrial conference be reset during these dates for a date and time that is available and convenient for this Court.

6. Further, counsel for Defendant agreed, in conjunction with the filing of this motion, to advise the Court that in the event that the case must be reset, counsel for Plaintiff is unavailable to appear in the above-styled civil action from Saturday, August 27, 2022 through and including Tuesday, September 6, 2022.

7. Good cause exists to reset the pretrial conference and any deadlines referenced above.

8. This request to reset the pretrial conference is not made for any dilatory purpose, and will not delay the trial of this matter set for July 26, 2022 but rather due to a trial conflict for the week of July 18, 2022 in the State Court of Athens-Clarke County, Georgia.

WHEREFORE, the Parties respectfully request that this Court reset the pretrial conference for a date and time between Tuesday, July 12, 2022 and Friday, July 15, 2022 and to extend the remaining pre-trial deadlines in accordance with the amount of time by which the pretrial conference is set back according to the Court's availability.

Dated: June 6, 2022.

Respectfully submitted,

/s/ Pamela Bagley Webb
Pamela Bagley Webb, BPR 33698
Gordon, Rees, Scully, Mansukhani
4031 Aspen Grove Dr., Suite 290
Franklin, TN 37067
Telephone: (615) 772-9010
pwebb@grsm.com
Counsel for Defendant

CERTIFICATE OF SERVICE

I certify that on June 6, 2022, I filed the foregoing *UNOPPOSED MOTION TO RESET JULY 18, 2022 PRETRIAL CONFERENCE* with the Court using CM/ECF, which will send notification of such filing to all counsel of record as follows:

Russell Thompson
(*pro hac vice*)
Amorette Rinkleib
Thompson Consumer Law Group, PC
11445 E Via Linda, Ste 2 #492
Scottsdale, AZ 85259
rthompson@thompsonconsumerlaw.com
arinkleib@thompsonconsumerlaw.com

Counsel for Plaintiff

/s/ Pamela Bagley Webb
Pamela Bagley Webb